

15.1
10/07/02

The SHOSHONE-BANNOCK TRIBES



FORT HALL INDIAN RESERVATION
PHONE (208) 478-3903
(208) 478-3907
FAX: (208) 478-3909

HAZARDOUS WASTE PROGRAM
P. O. BOX 306
FORT HALL, IDAHO 83203

RECEIVED

October 7, 2002

OCT 09 2002

Linda Meyer(MS-121)
Project Coordinator
U.S. EPA, Region X
1200 Sixth Avenue
Seattle, WA 98101

OFFICE OF WASTE
& CHEM. MGMT.

**Subject: Pre-Final Remedial Design Report and Draft Remedial Action Workplan Dewatering
Pit Solids removal - Simplot Plant Area**

The Shoshone-Bannock Tribes' CERCLA/RCRA Program appreciates the opportunity to comment on the above referenced Workplan by Simplot.

Simplot proposes to sample the excavation site after removal of pit solids. However the workplan proposes inadequate sampling to confirm that pit solids have been excavated. As proposed (in Section 3.2) only four composite samples are to be analyzed from the two large pits; and only one composite sample from the smaller pit. Nine samples appears to be inadequate for an area of 41,750 Square feet. We recommend that sampling include at least 10 samples from each pit and that they not be composited, and that they include the full suite of constituents for analyses. (Arsenic, Beryllium, Cadmium, Chromium, Fluoride, Phosphorous, and Zinc).

The risk assessment should not be limited to risks due to ingestion. A short-term risk may be associated with inhalation from fugitive dust, both during excavation, transport, unloading at the gypsum stacks, and once deposited, from the gypsum stacks themselves. The risk assessment should be revised accordingly.

The Workplan is inadequate with respect to providing plans to protect workers or the public from fugitive dust during the excavation, and transport of pit solids to the gypsum stacks. The Workplan should include a plan to carry-out EPA Method 9 Visual Emission Evaluation (VEE) from certified evaluators each day that the 6,800 cubic yards of material is transported to the gypsum stacks, with additional controls specified if VEE readings exceed 20%. VEE reports should be submitted to EPA and IDEQ. A contingency plan should be in place, where the truck transport of pit material across highway 30 is stopped when high winds or other conditions

obscure vision for motorists. Additionally, Simplot should consider covering the trucks during transport, as appropriate in this PM-10 Non-attainment area. Section 4.5 does not give sufficient detail on limiting fugitive dust. What is the watering schedule at the worksites?

Construction Reporting (Section 5.3)

The information in this section should be revised to include daily EPA method 9 Visible Emission Evaluations (VEEs), at the pit area, the crossing of Highway 30, and at the truck unloading area at the gypsum stacks.

Regrading (Section 3.3)

Simplot proposes that no vegetative cover be necessary, because they plan on constructing a lined pond in the near future in this area. Simplot should revise this section to give a reasonable time-period to start the construction of the new pond, with a contingency plan to place a vegetative cover over the pit area, if construction of the new pond does not start within a reasonable period after pit remedial action is complete (nine months?).

These three pits typically receive water from the West Over-Flow ponds. Simplot should describe where this water will be directed during the period between decommissioning the dewatering pits and the construction of a new pond in the area.

Thank-you for your consideration in reviewing these comments.

Sincerely,



Roger Turner

Interim CERCLA/RCRA Manager

cc: Ward Wolleson, Senior Environmental Engineer, Simplot
Alonzo Coby, Interim Land Use Director
File